

**KEMP & KEMP**  
ATTORNEYS AT LAW  
7435 W. Azure Drive, Suite 110  
LAS VEGAS, NEVADA 89130  
Tel. (702) 258-1183 • Fax (702) 258-6983

JAMES P. KEMP, ESQUIRE  
Nevada Bar No. 006375  
KEMP & KEMP, ATTORNEYS AT LAW  
7435 W. Azure Drive, Suite 110,  
Las Vegas, NV 89130  
(702) 258-1183 tel./ (702) 258-6983 fax  
[jp@kemp-attorneys.com](mailto:jp@kemp-attorneys.com)  
Attorney for Plaintiff Reginald Sullivan

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

REGINALD SULLIVAN,

Plaintiff,

vs.

CLARK COUNTY, a political subdivision of  
the State of Nevada; JOHN MARTIN in his  
official and/or individual capacities;  
PATRICK SCHREIBER in his official and/or  
individual capacities,

Defendants.

CASE NO. 2:18-cv-00825-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANTS' MOTION  
FOR SUMMARY JUDGMENT**

**(Second Request)**

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion for Summary Judgment (ECF No. 35) from the current due date of Wednesday, May 6, 2020 through and including **Wednesday, May 20, 2020.**

This is the second request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

1. Plaintiff's counsel continues to have an extraordinarily heavy workload with respect to briefing. Plaintiff's counsel has had, or has upcoming, the following substantial briefings due in other cases:
  - a. Reply Brief filed on Ninth Circuit appeal filed April 20, 2020;
  - b. Opening Brief on State Court Judicial Review Petition (Horton) April

20, 2020 (actually got filed April 17);

- c. Reply to Opposition to Motion to Dismiss in Bankruptcy Court April 21, 2020;
- d. Opposition to Motion for Summary Judgment in Buchanan vs. Watkins & Letofsky was filed on April 29;
- e. Opposition to Motion for Summary Judgement (with help of co-counsel) in state court case of Lewis vs. Marnell Gaming was filed on April 30, 2020;
- f. Plaintiff's Motion for Partial Summary Judgment filed in Lewis vs. Marnell Gaming in state court on May 1, 2020;
- g. Opposition to Motion to Dismiss in Matthys vs. Barrick due May 6, 2020;
- h. Opposition to Partial Motion to Dismiss in Tanasi vs. Sahara West due May 11, 2020
- i. Plaintiff's opposition to a second Motion for Summary Judgment in Lewis vs. Marnell will be due May 15, 2020;
- j. Motions in limine due in C.D. California case Raffeale vs. VCA May 15, 2020
- k. Summary Judgment Opposition due in C.D. California case Raffeale vs. VCA May 22, 2020;

These are all significant matters most of which requiring extensive briefing. Additionally, Plaintiff's counsel has had to respond to extensive discovery requests that are due in the next two weeks, has had to file new

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cases and continue to advise and consult new clients by telephone including assisting them with filing discrimination charges with Nevada Equal Rights Commission and EEOC. Being short staffed, running reduced hours to socially distance, and the heavy workload set forth above necessitates more time to respond to the Motion for Summary Judgment in this case. Summary judgment oppositions such as the one in this case generally take 40 to 50 hours to complete. Plaintiff's counsel has not had time to meet (telephonically) with Mr. Sullivan to prepare his declaration and more time is needed for that as well.

This stipulation to extend the deadline is made in good faith and not for purposes of delay.

DATED this 5<sup>th</sup> day of April, 2020.

DATED this 5<sup>th</sup> day of April, 2020.

KEMP & KEMP, ATTORNEYS AT LAW

LEWIS BRISBOIS BISGAARD & SMITH LLP

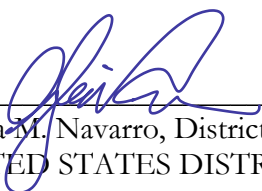
By: /s/ James P. Kemp  
JAMES P. KEMP, ESQ.  
Nevada Bar No. 6375  
7435 W. Azure Drive, Suite 110  
Las Vegas, Nevada 89130  
*Attorneys for Plaintiff*

By: /s/ Robert W. Freeman  
ROBERT W. FREEMAN, ESQ.  
Nevada Bar No. 003062  
6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
*Attorneys for Defendants*

### **ORDER**

**IT IS SO ORDERED.**

Dated this 5 day of May, 2020.

  
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Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT